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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

**In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION**

This Document Relates to:

*Dell Inc. and Dell Products L.P. v. Hitachi
Ltd. et al., No. 13-cv-02171*

Case No. Master File No. 3:07-cv-5944-SC

MDL No. 1917

**DECLARATION OF
TIFFANY B. GELOTT IN SUPPORT OF
DEFENDANTS' JOINT MOTION FOR
SUMMARY JUDGMENT BASED UPON
PLAINTIFFS' FOREIGN
TRANSACTIONS BARRED BY THE
FTAIA**

Judge: Hon. Samuel P. Conti
Court: Courtroom 1, 17th Floor
Date: February 6, 2015, 10 a.m.

1 I, Tiffany B. Gelott, declare and state as follows:

2 1. I am an associate with Baker Botts LLP, counsel of record for Defendants
3 Koninklijke Philips N.V. and Philips Electronics North America Corporation in this action. I am
4 a member of the bar of the District of Columbia and have been practicing before this Court in the
5 above captioned matter on a *pro hac vice* basis. I make this Declaration in Support of
6 Defendants' Joint Motion for Summary Judgment Based Upon Plaintiffs' Foreign Transactions
7 Barred by the Foreign Trade Antitrust Improvements Act ("FTAIA").

8 2. The information contained herein is based on my own personal knowledge and if
9 called as a witness I could, and would, testify competently that the matters set forth herein are
10 true and accurate to the best of my recollection.

11 3. The materials referenced in this declaration were all designated by Dell Inc. and
12 Dell Products L.P. ("Plaintiffs") as "Highly Confidential" and filed under seal. Therefore, there
13 is an overriding interest in not disclosing the materials and Defendants must file these documents
14 under seal to safeguard the confidentiality of each document.

15 4. Attached hereto as Exhibit A is a true and correct copy of Plaintiffs' Supplemental
16 Responses to Defendants LG Electronics, Inc.'s and Samsung SDI Co. Ltd's First Set of
17 Interrogatories, Nos. 8 and 9, dated June 16, 2014.

18 5. In support of its Joint Motion, Defendants have attached, as Exhibit B, true and
19 correct copies of excerpts from the Oral Videotaped Deposition of Julie French, dated June 2,
20 2014.

21 I declare under penalty of perjury under the laws of the United States that the foregoing is
22 true and correct. Executed this 7th day of November, 2014 at Washington, District of Columbia.

23
24 /s/ Tiffany B. Gelott
25 Tiffany Gelott
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